HANG & ASSOCIATES, PLLC
ATTORNEYS AT LAW
136-18 39th Avenue, Suite 1003
Flushing, New York 11354

April 10, 2017

Keli Liu, ESQ.
Tel : (718) 353-8588
Cell: (718) 350-9308
Fax: (718) 353-6288
Email: Kliu@hanglaw.com

VIA ECF
Judge Margo K. Brodie
225 Cadman Plaza East
Brooklyn New York 11201
Telephone: (718) 613-2140

Re: Liu v. Da Di Chinese Food, Inc., et al.

Case No. 1:16-cv-00937

Request for Extension of time to file Response to Defendants' Pre-motion Conference Request

Dear Judge Brodie:

This office represents the Plaintiff in the above-referenced matter. On March 17, 2017, Defendants requested a Pre-motion Conference for their anticipated motion for Summary Judgement ("Defendant's March 17 Request"). ECF. No. 32. Per your Honor's Individual Rule, Plaintiff has an option to respond in seven (7) days. On March 20, 2017, Magistrate Judge Steven L. Tiscione granted Plaintiff's request to extend the discovery deadline to March 31, 2017 so we can depose two non-party witnesses. *See* Decision issued on March 20, 2017. On March 21, 2017, this Court granted Plaintiff's motion to extend time to response to Defendants' pre-motion letter to April 17, 2017 so Plaintiff can respond after the non-party witnesses' depositions. Plaintiff now request the second extension for the following reason:

Due to the parties' dispute over the sufficiency of the service of Subpoenas (ECF. No. 34, 35), Plaintiff was unable to conduct depositions on the non-party witnesses. On April 10, 2017, Judge Tiscione issued a decision on the Parties' respective motions and extended the discovery deadline to *May 19, 2017* for Plaintiff to complete depositions on the non-party witnesses. As such, we respectfully request that Plaintiff's time to respond to Defendants' March 17 Request be extended to **June 2, 2017**.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ *Keli Liu*
Keli Liu, Esq.